

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**MARVIN WILLIAMS and SHIRLEY
WILLIAMS,**

Plaintiffs,

v.

AVON PRODUCTS, INC., et al.,

Defendants.

Case No. 4:19-cv-02337

PLAINTIFFS' MOTION FOR LEAVE TO AMEND

Plaintiffs move this Court, pursuant to Rule 15 of the Federal Rules of Civil Procedure, for leave to amend the Complaint to substitute SHIRLEY WILLIAMS, Individually and as Anticipated Personal Representative of the Estate of MARVIN WILLIAMS, SR., Deceased, and On Behalf of All Heirs, and PAMELA HALL, CHARISSE WHEELER, TERRELL CHAMBERS and MARVIN WILLIAMS, JR., Individually, and to conform the language to reflect the death and substitution, to remove dismissed parties and to add an additional causes of action alleging the wrongful death of MARVIN WILLIAMS, SR., fraud and basis for punitive damages. The proposed amendment is attached hereto as "Exhibit A" and a clean version of the proposed amendment is attached hereto as "Exhibit B."

A memorandum in support of this motion is filed herewith.

WHEREFORE, Plaintiffs pray that they be granted leave of court to amend the complaint to make the changes and additions found in "Exhibit A" to this motion to the original complaint.

Respectfully submitted,

SIMON GREENSTONE PANATIER, PC

/s/ Dana C. Simon

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was electronically served on all parties of record through the Court's Electronic Case Filing system.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2020.

/s/ Dana C. Simon

Dana C. Simon